

PROPOSED SETTLEMENTS IN CANADIAN AUTO PARTS PRICE-FIXING CLASS ACTIONS

BETWEEN 1998 AND 2019, DID YOU OR YOUR COMPANY:

1. Purchase and/or lease, directly or indirectly, a new or used automotive vehicle in Canada or for import into Canada; and/or
2. Purchase, directly or indirectly, any of the following automotive parts listed in the chart below in Canada.

If so, you might be affected by settlements reached in related class actions.



SETTLEMENTS ACHIEVED

The following settlements have been achieved:

Defendants	Relevant Part	Relevant Period	Amount
DENS0 Corporation, DENS0 International America, Inc., DENS0 Manufacturing Canada, Inc., DENS0 Sales Canada, Inc., DENS0 Korea Corporation (f/k/a separately as DENS0 International Korea Corporation and DENS0 Korea Automotive Corporation), DENS0 Products and Services Americas, Inc. (f/k/a DENS0 Sales California, Inc.), DENS0 Automotive Deutschland GmbH, ASMO Co., Ltd., ASMO North America, LLC, ASMO North Carolina, Inc., ASMO Greenville of North Carolina, Inc., ASMO Manufacturing, Inc., Korea Wiper Blade Co., Ltd. and Techma Corporation	Air Conditioning Systems	2001 to 2019	\$4,943,000
	Air Flow Meters	2000 to 2017	\$150,000
	Alternators	2000 to 2017	\$5,120,000
	ATF Warmers and Oil Coolers	2002 to 2017	\$302,000
	Automotive Exhaust Systems	2002 to 2019	\$150,000
	Ceramic Substrates	1999 to 2019	\$150,000
	Electronic Control Units	1999 to 2016	\$439,000
	Electronic Throttle Bodies	2000 to 2017	\$150,000
	Fan Motors	2000 to 2019	\$150,000
	Fuel Injection Systems	2000 to 2017	\$2,792,000
	Fuel Senders	1999 to 2015	\$150,000
	Heater Control Panels	2000 to 2016	\$150,000
	HID Ballasts	1998 to 2018	\$678,000
	Ignition Coils	2000 to 2017	\$1,060,000
	Instrument Panel Clusters	1998 to 2015	\$2,419,000
	Inverters	2000 to 2017	\$150,000
	Motor Generators	2000 to 2017	\$150,000
	Oxygen Sensors	2000 to 2018	\$860,000
	Power Window Motors	2000 to 2019	\$150,000
	Radiators	2000 to 2017	\$2,360,000
Spark Plugs	2000 to 2018	\$399,000	
Starters	2000 to 2017	\$1,428,000	
Valve Timing Control Devices	2000 to 2017	\$534,000	
Windshield Washer Systems	2000 to 2019	\$150,000	
Windshield Wiper Systems	2000 to 2018	\$178,000	
	Total		\$25,162,000
Hitachi Metals, Ltd. and Hitachi Cable America Inc.	Automotive Brake Hoses	2004 to 2019	\$175,000
NGK Spark Plugs (U.S.A.), Inc., NGK Spark Plugs Canada Limited, NGK Spark Plug Co., Ltd., and NTK Technologies, Inc.	Automotive Exhaust Systems	2000 to 2019	\$66,510
	Oxygen Sensors	2000 to 2018	\$1,080,787.50
	Spark Plugs	2000 to 2018	\$1,080,787.50
	Total		\$2,228,085

The settlements are a compromise of disputed claims and are not an admission of liability, wrongdoing or fault by any of the parties. Depending on where the litigation was commenced, the settlements are subject to the approval of one or more of the Ontario, British Columbia and/or Quebec Courts.

Settlement class members have the following options:

1. Tell the Court what you think about the proposed settlements in writing or speak to the Court at the hearings. Written submissions must be submitted on or before February 21, 2020;
2. Opt out of (or exclude yourself from) the actions relating to Air Conditioning Systems, ATF Warmers and Oil Coolers (for purchases of Oil Coolers only), Automotive Exhaust Systems, and Ceramic Substrates (only for purchases made between July 1, 1999 and June 30, 2000). There will be no further opportunities to opt out of these actions. The deadlines to opt out of the other actions listed above have already passed. Requests to opt out must be postmarked on or before March 24, 2020; or
3. Do nothing, which will allow you to be eligible to participate in the ongoing class actions.

See the long-form notice online at www.siskinds.com/autoparts for more information.

PROPOSED DISTRIBUTION OF SETTLEMENT FUNDS

The Courts will also be asked to approve a protocol for distributing the aggregate settlement funds in the class actions relating to Air Flow Meters, Electronic Control Units, Fan Motors, Fuel Senders, Power Window Motors and Windshield Washer Systems. A copy of the proposed distribution protocol is available at www.siskinds.com/autoparts.

To be eligible for compensation, a Settlement Class Member must have purchased and/or leased one or more of the following new passenger cars, sport utility vehicles, vans, and light trucks (up to 10,000 lbs) "Affected Vehicles":

Action	Period	Brands
Air Flow Meters	Jan 1, 2002 - Dec 31, 2009	Honda/Acura, Nissan/Infiniti, and Toyota/Lexus
Electronic Control Units	Jan 1, 2000 - Dec 31, 2008	Toyota/Lexus
Fan Motors	Jan 1, 2001 - Dec 31, 2008	Honda/Acura, Nissan/Infiniti, and Subaru
Fuel Senders	Jan 1, 2004 - Dec 31, 2010	Toyota/Lexus
Power Window Motors	Jan 1, 2000 - Dec 31, 2005	Honda/Acura and Nissan/Infiniti
Windshield Washer Systems	Jan 1, 2000 - Dec 31, 2010	Nissan/Infiniti and Subaru

No wrongdoing is alleged against Honda/Acura, Nissan/Infiniti, Toyota/Lexus, or Subaru. They are not defendants in the class actions. The class actions were brought against automotive part manufacturers who allegedly price-fixed the products listed above. Honda/Acura, Nissan/Infiniti, Toyota/Lexus, and Subaru unknowingly installed the allegedly price-fixed automotive parts in their automotive vehicles.

A previous distribution protocol was approved in the context of the Automotive Wire Harness class action. The claims process in the above-noted cases will run in conjunction with the Automotive Wire Harness claims process and claims will be adjudicated based on the information provided by Settlement Class Members in the Automotive Wire Harness claims process.

The proposed distribution protocol provides that, subject to further order of the Ontario Court, the settlement funds will be distributed on a *pro rata* (or proportional) basis based on the value of your claim relative to the value of all approved claims. The value of your claim will depend on:

- a) The purchase price of the Affected Vehicle: The purchase price will be based on the information provided as part of the Automotive Wire Harness claims process, adjusted to cover the relevant years.
- b) The categorization of the Settlement Class Member: Settlement Class Members will be categorized as follows:
 - i. *National Brand Importers* means Toyota Canada Inc., Honda Canada Inc., Nissan Canada Inc., and Subaru Canada, Inc. National Brand Importers' purchases or leases will be valued at 7.5% of the purchase price.
 - ii. *Dealer* means a Settlement Class Member who purchased Affected Vehicles from a National Brand Importer or a subsidiary thereof, for resale to End Users. Dealer's purchases or leases will be valued at 25% of the purchase price.
 - iii. *End User* means a Settlement Class Member who purchased or leased an Affected Vehicle for its own use and not for commercial resale. End Users' purchases or leases will be valued at 67.5% of the purchase price.

See the long-form notice available online at www.siskinds.com/autoparts for a sample calculation.

Approximately 40 cases have been commenced in respect of the alleged price-fixing of automotive parts. As additional auto parts cases resolve, it is likely that some of the resolved cases will relate to the same brands and years covered by the Automotive Wire Harness case. Subject to court approval, your eligibility for settlement benefits in those cases may depend on applying for settlement benefits in the Automotive Wire Harness case. If you do not apply for settlement benefits in the Automotive Wire Harness case, you may not be entitled to settlement benefits in those cases. For updates on the status of the proposed distribution of settlement funds, visit www.siskinds.com/autoparts.

CLASS COUNSEL

The law firms of Siskinds LLP, Sotos LLP, Camp Fiorante Matthews Mogergerman LLP, Siskinds Desmeules s.e.n.c.r.l. and Klein Lawyers LLP (Oxygen Sensors and Spark Plugs actions only) represent members of these class actions.

For more information, visit www.siskinds.com/autoparts, email autoparts@sotosllp.com or call 1.888.977.9806.